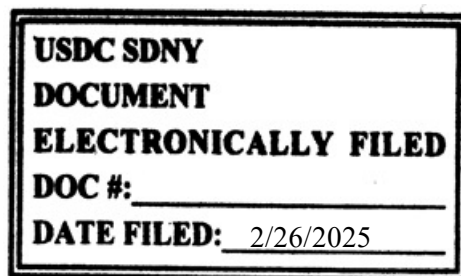


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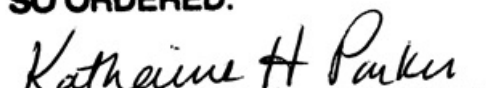
February 25, 2025

Defendant's Letter Motion is GRANTED in part. All deadlines in this case shall be stayed until 14 days after the end of mediation. The parties shall file a letter with the Court informing the Court of the date of their mediation **by March 5, 2025**. The parties shall file a Joint Status Letter, updating the Court on the status of settlement **no later than 14 days following the end of mediation**. **The Clerk of Court is respectfully directed to stay this case.**

VIA ECF

Hon. Katharine H. Parker
U.S. District Court
500 Pearl Street, Room 750
New York, NY 10007

SO ORDERED:


HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

2/26/2025

Re: *Catherine Svoboda v. Highgate Hotels, L.P.*, Case No. 1:25-cv-00481

Dear Judge Parker:

This firm represents Highgate Hotels, L.P. ("Defendant") in the above-referenced action. Pursuant to your Honor's Individual Rules of Practice, I write to respectfully request a stay of case deadlines, including Defendant's deadline to answer or otherwise respond to the complaint, pending the parties' upcoming mediation. On January 16, 2025, Plaintiff Catherine Svoboda ("Plaintiff") filed a putative class action complaint against Highgate Hotels, L.P. On or about February 5, 2025, Plaintiff served Defendant with the complaint. Pursuant to Fed. R. Civ. P. 12(a)(1), the deadline for Defendant to answer or otherwise respond to Plaintiff's complaint is February 26, 2025. This is Defendant's first request for an adjournment of time. Plaintiff consents to the requested stay of case deadlines. On or about February 21, 2025, counsel for Defendant was made aware of Plaintiff's service on Defendant, as such, good cause exists for Defendant's filing this letter request without 48 hours' notice, pursuant to this Court's Individual Rules of Practice.

On December 30, 2024, a closely related action, arising out of the same data security incident alleged in the instant complaint, was filed in this Court, captioned *Elena Bugaeva v. Highgate Hotels, L.P.*, Case No. 1:24-cv-10001. On January 7, 2025, a second and closely related action, arising out of the same data security incident alleged in the instant complaint, was filed in this Court, captioned *Rachel Oliver v. Highgate Hotels, L.P.*, Case No. 1:25-cv-00137. Counsel for Defendant have been actively conferring with Plaintiff's counsel regarding the best way to streamline the litigation(s), including consolidation of the related cases and the potential for early alternative dispute resolution. As such, the Parties in the related cases have agreed to attend a formal mediation, and are currently determining available dates in May 2025. Subject to court approval, the Parties agree to provide this Court with notice, no later than 7 days from today, of the date of the scheduled mediation.

February 25, 2025

Page 2

Based on the foregoing, and for good cause, Defendant respectfully requests that the Court enter an Order staying all case deadlines, including the time for Defendant to answer or otherwise respond to Plaintiff's complaint. The Parties further agree, subject to Court approval, to file a Joint Status Report with the Court no later than 14 days following the mediation, advising the Court of the status of the settlement, if any.

Respectfully submitted,

/s/ Matthew C. Berger

Matthew C. Berger